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December 28, 2005

Mr. Charles Anderson
ICF Consulting
Via Email: canderson@icfconsulting.com

Re: Draft 1 ENERGY STAR® Version 2.0 Roof Products Specification

Dear Mr. Anderson:

We have reviewed the draft referenced above and would like to offer the following comments:

- **Page 2, Note at the top of the page:** As background, let me say that the solar reflectance of metal roofing, whether painted or not, is determined by the value measured on the surface. It is independent of the final shape or "Model" of the product. There are two factors that can account for discrepancies in listings for metal roofing products between ENERGY STAR and the CRRC. First, the "Brand" listed in ENERGY STAR for many metal roofing products is the color of the paint that is applied. In keeping with suggestions from ENERGY STAR, various categories or families of roofing products are listed under the "Model" (standing seam, tile, shingles, etc.) This method is more descriptive, and there is no cost associated with the multiple listings for the same color, as ENERGY STAR has no fees. Second, CRRC charges a fee for each line item. Therefore, companies are more selective in their listings and are more likely to describe the "Brand" as "Roofing Products" and the "Model" as the paint color or surface that was tested. This is a legitimate yet economical way of describing a broad range of roofing products that have the same solar reflectance and thermal emittance.
- **Page 6, Table 1:** Correct the clerical error for Thermal Emittance. The Performance Specification should read "Greater than or equal to 0.75."
- **Page 6, Note:** Perhaps the following note from this section should be included as a footnote to Tables 1 and 2 for clarity: "Because the thermal emittance of a product model, particularly those models with high emittance, does not change much over time, EPA is not including a requirement for maintenance of thermal emittance."
- **Page 6, Note:** We are not in favor of increasing the initial low slope roof product solar reflectance requirement to 0.70. Products with a solar

reflectance of 0.65, especially those with high thermal emittance can provide significant energy savings. It seems unnecessary to raise the bar and eliminate products when the added energy benefit is marginal.

- Page 9, First Note Section: The word "filed" in the fourth line should be "field." It is not necessary to make this correction unless the note finds its way into another document.
- Page 9, First Note Section: You requested input on accelerated aging techniques to determine the maintenance of solar reflectance. We concur with your current position that in-field aging is the preferred method at this time.

We value the work that ENERGY STAR is doing and appreciate the opportunity to participate. If you have questions, I can be reached 610-395-8445 or bgoodhart@atas.com.

Best regards,



Robert R. Goodhart
Product & Process Development